

**BEFORE THE SOUTHLAND REGIONAL COUNCIL**

**APP-20191150 and APP-20191703**

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of applications for resource consents for the  
Lake 2 Lake multi use trail

**BY** **THE FIORDLAND TRAILS TRUST**  
Applicant

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**SUBMISSIONS OF COUNSEL FOR THE APPLICANT IN RESPECT OF  
RSEPNSES TO PROPOSED CONDITIONS**

**2 July 2020**

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**MAY IT PLEASE THE COMMISSIONER:**

1. This memorandum is filed in final reply to the comments made by the Reporting Officer and sole submitter in opposition to the Applicant's proposed conditions.
2. The amendments to the conditions suggested by the Reporting Officer are not opposed by the Applicant.
3. Mr Rodway's submissions appear to misunderstand the directions given. His comments stray beyond the drafting of the Applicant's proposed conditions and address substantive matters, mostly already raised by him in his submissions. The Applicant will therefore not respond to the matters raised for those reasons, subject only to reserving its position in the event you take a different view and wish to hear from it on any matter raised.



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CP Thomsen  
Counsel for the Applicant  
2 July 2020